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June 26, 2024

6/26/24

MEMO ENDORSE

Sentencing Adj' to  
Sept. 5, 2024  
At 11:00 am.

Hon. Colleen McMahon  
United States District Judge  
United States District Court  
U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Tomas Ianchauskas**  
**24 Cr. 266 (CM)**

*Colleen McMahon*

Dear Judge McMahon:

I write on behalf of my client, Tomas Ianchauskas, to request a short continuance of his sentencing currently scheduled for July 11, 2024.

I have been informed by the assigned Probation Officer that the Pre-Sentence Report will not be released until sometime later this week. I will need sufficient time to review the PSR with my client as well as incorporating the findings and recommendations in my sentencing submission. There has also been an outpouring of letters in support of Mr. Ianchauskas that are still in the process of being translated from Russian to English. The requested continuance will provide me with the opportunity to prepare a submission for timely filing.

Accordingly, and respectfully, with the Government's consent, counsel requests that the Court adjourn sentencing to a date during the week of July 29, 2024 (except for the morning of July 30) or as soon thereafter as is convenient to the Court.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,

*Richard H. Rosenberg*  
Richard H. Rosenberg

Cc: All counsel (by ECF)

USDC SDNY
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